

**APPENDIX B**

**DISCOVERY PLAN WORKSHEET**

**Tier I Pre-Settlement Discovery  
TO BE COMPLETED IN ALL CASES**

Deadline for completion of Rule 26(a) initial disclosures  
and HIPAA-complaint records authorizations: November 10, 2023

Completion date for Phase I Discovery  
as agreed upon by the parties: November 10, 2023  
(See paragraph 7 of joint letter requirement)

Status conference TBD by the court: November 27, 2023  
(Generally 15 days post Tier I Discovery)

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings:  
(Presumptively 15 days post status conference) December 7, 2023

All fact discovery completed by: September 9, 2024  
(Presumptively 9 months after deadline for  
joining parties/amend the pleadings)

Expert discovery completed by: December 6, 2024  
(Presumptively 3 months after close of fact  
discovery)

Final date to take first step in dispositive motion practice: January 6, 2025  
(Parties are directed to consult the District Judge's  
individual rules regarding such motion practice.  
(Presumptively 30 days after close of discovery)

Joint Proposed Pretrial Order to be  
submitted: February 5, 2025  
(30 days after dispositive motion  
practice deadline)